

**DISTRICT COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

KEVONGH J. GRANT	)	
	)	
Plaintiff,	)	CASE NO. 1:19-cv-00025
	)	
vs.	)	(Removed from the Superior
	)	Court of the Virgin Islands
APTIM ENVIRONMENTAL AND	)	Case No. SX-19-CV-151)
INFRASTRUCTURE, INC., WITT O'BRIEN'S,	)	
LLC, ODEBRECHT CONSTRUCTION, INC.,	)	<b>ACTION FOR DAMAGES</b>
NATHAN McCANN, ANDREW McCANN,	)	
JOHN DOES, JANE DOES, and UNKNOWN	)	
CORPORATIONS,	)	
	)	
Defendants.	)	
	)	

**NOTICE OF 30(b)(6) VIDEOTAPED DEPOSITION TO**  
**APTIM ENVIRONMENTAL AND INFRASTRUCTURE, INC.**

TO: Aptim Environmental and Infrastructure, Inc.  
C/O: Alex Moskowitz, Esq.  
Dudley, Newman & Feuerzeig, LLP  
Law House  
P.O. Box 156  
St. Thomas, VI. 00804  
[amoskowitz@dnfvi.com](mailto:amoskowitz@dnfvi.com)

**PLEASE TAKE NOTICE** that Plaintiff Kevongh Grant will take the video deposition(s) of the above referenced Defendant pursuant to FRCP 34 before an authorized court reporter on the 27th of January 2023 via Zoom, at 1:00 pm AST. The deposition will be conducted pursuant to the Federal Rules of Civil Procedure before a Notary Public, or before some other officer authorized by law to administer oaths.

Defendant is requested, pursuant to FRCP Rule 30(b)(6), to designate one or more of its officers, directors, or managing agents or other persons who consent to testify about matters known or reasonably available to Defendant Aptim Environmental and Infrastructure, Inc. The

*Kevongh J. Grant vs. Aptim Environmental and Infrastructure, Inc., et al.*

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matters on which each person so designated will be examined will include items 1-52 identified in **Schedule A** to this notice. In addition, the Deponent(s) shall bring to the deposition the documents/things listed in **Schedule A**, a-s. You are advised that you must designate one or more officers, directors, managing agents, or other persons who will testify on your behalf regarding the matters listed in “**Schedule A**” which are reasonably available to Aptim Environmental and Infrastructure, Inc.

Respectfully submitted,

DATED: 26 January 2023

/s/ Diane M. Russell

**Diane M. Russell, Esq.**

Law Offices of Diane M. Russell, P.C.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 26th day of January 2023, I electronically filed the foregoing *Notice of 30(b)(6) Videotaped Deposition to Aptim Environmental and Infrastructure, Inc.*, with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

**Alex M. Moskowitz, Esq.**  
Lisa Michelle Komives, Esq.  
Dudley, Newman & Feuerzeig, LLP  
Law House  
P.O. Box 156  
St. Thomas, VI. 00804  
[amoskowitz@dnfvi.com](mailto:amoskowitz@dnfvi.com)

And Served by Electronic Mail to:

**Yvonne Setorie, RPR**  
Elite Reporting Services, Inc.  
P.O. Box 5619  
Christiansted, St. Croix 00823  
Facsimile: (340) 778-2461  
[elitereportingsvcs@gmail.com](mailto:elitereportingsvcs@gmail.com)

/s/ Diane M. Russell